

UNITED STATES OF AMERICA
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Case No. 17-cr-20274

Plaintiff,

Honorable Bernard A. Friedman

v.

**MOTION AND BRIEF TO
AMEND BOND CONDITIONS**

FAKHRUDDIN ATTAR, D-02,
and
FARIDA ATTAR, D-03,

Defendants.

Fakhruddin Attar, M.D., through his attorney Mary Chartier, and Farida Attar, through her attorney Matthew Newburg, move to amend their bond conditions. Counsel has been unable to receive concurrence from the Assistant United States Attorney. The Attars request the following amendments.

1. Based on hearings in the state court case involving their parental rights, the Attars would like a more specific order allowing them to live at their home with their daughter. The move home, of course, would not occur without the additional approval of the

state court judge.

2. Authorization for the Attars to use a computer outside of counsels' presence to listen to audio and watch video involved with the case, as well as to review discovery from the case and documents and materials that counsel would like the Attars to review. There would have to be some programs on the computer to allow the Attars to view these materials, but this would not involve internet access.
3. Allow the Attars to write notes electronically on or about the discovery and materials. This would involve computer programs, but this would not involve internet access.
4. Allow the Attars to go out on the hotel property and use the common areas, like the exercise room and have breakfast in the lobby.
5. Allow the Attars to go to the library – as approved by Pretrial Services – to assist in their defense.
6. Allow Mrs. Attar to talk to their accountant to wrap up the business. Currently, only Dr. Attar is allowed to do this.

Accordingly, Dr. Attar and Mrs. Attar respectfully request that this Court amend their bond conditions.

Respectfully submitted,

08/27/2017

Date

/s/MARY CHARTIER

Mary Chartier

08/27/2017

Date

/s/MATTHEW NEWBURG

Matthew Newburg

Certificate of Service

I hereby certify that on August 27, 2017, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification to parties enrolled through the ECF system. A hard copy has been mailed via the United States Postal Service to those who are not enrolled.

/s/MARY CHARTIER

Mary Chartier

Chartier & Nyamfukudza, P.L.C.

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